



NORTHWESTERN LEHIGH SCHOOL DISTRICT

6493 ROUTE 309, NEW TRIPOLI, PA 18066-2099

(610) 298 – 8661

www.nwlehighsd.org

April 10, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Request for Waiver of Form 471 Filing Deadline for Funding Year 2019
CC Docket No. 02-6

Contact:

Northwestern Lehigh School District
NWLSD BEN#125924
Leslie Frisbie, Business Administrator
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New Tripoli, PA 18066
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FY 2019 Form 471 Application#191041990

Dear Ms. Dortch,

I am writing to respectfully request the FCC to grant a waiver of the Funding Year 2019 Form 471 deadline so that our Form 471 E-rate application will be considered as having been filed within the "window". The Form 471 was submitted on April 10, 2019.

Reason for submitting late: The district planned on submitting a 471 for a larger infrastructure project which was competitively bid. The project included both erate eligible items as well as non erate eligible items. The bid was structured with the ability to award separate vendors for the erate and non erate items however when evaluating the bid results since the total project cost exceeded the Pennsylvania statutory bidding requirements, the district was obligated to award the bid to the overall lowest cost vendor. Based on the individual components of the erate eligible items, the district did not have the ability to carve out the erate eligible items and still award the bid to the overall lowest cost contractor. As a result, we were unable to complete the 471 process and in an effort to apply for erate reimbursement, the district performed a PEPPM mini-bid. Due to the timing of the competitive bid results and the requirements for the PEPPM mini-bid we were unable to meet the deadlines.

The district has not previously requested Category 2 funding due to timing of improvements and availability of funding. The Category 2 funding, if approved would help offset the overall project costs and save the local taxpayers. If the erate reimbursement is granted, the district would be able to allocate the savings to future projects and complete necessary upgrades in a timelier manner. We respectfully request the waiver due to this circumstance.

We realize that previous precedent is for the Commission to grant Form 471 deadline waiver requests if the Form was submitted within 14 days of the Form 471 deadline.¹ In light of the reasons stated above, we respectfully request the FCC view these extenuating circumstances as good cause to waive the Form 471 deadline for this application.

Thank you for your consideration of our request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leslie Frisbie". The signature is written in a cursive, flowing style.

Leslie Frisbie
Business Administrator

¹ *Requests for Waiver and Review of Decisions of the Universal Service Administrator of Academy of Math and Science et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 25 FCC Rcd 9256, 9259, para. 8 (2010) (Academy of Math and Science Order).*